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**REMARKS**

Claims 1-19, 21 and 22 of the application stand rejected. Claims 1, 8, 11 and 19 have been amended herein to more clearly define the scope of the presently claimed invention. Applicants respectfully requests reconsideration of pending Claims 1-19 and 21-25 in light of the amendments and remarks herein.

**35 U.S.C. §103**

Claims 1-9, 11-13, 16, 19, 21 and 22 stand rejected under 35 U.S.C. §103 as being unpatentable over Li in view of Banning et al, U.S. Patent No. 5,421,008 ("Banning"). Additionally, Claim 10 stands rejected under 35 U.S.C. §103 as being unpatentable over Li in view of Banning and in further view of Hsu, U.S. Patent No. 6,374,079 ("Hsu"). And finally, Claims 14, 15, 17 and 18 stand rejected under 35 U.S.C. §103 as being unpatentable over Li in view of Applicant's admitted prior art. Applicants respectfully traverse each and every one of the Examiner's rejections.

The Examiner essentially rejects Applicants' previously submitted arguments because the Examiner alleges that the terms "system model" and "presentation model" as used in the claims are broad and do not specify the limitations described in the specification. The Examiner thus concludes that as used in the claims, the terms are not clear enough. Applicants respectfully disagree with the Examiner's contention that the claims are required to include the definitions from the specification and traverse the Examiner's suggestion that such definition is required. Applicants are not aware of any rule that requires such explicit definition of terminology in the claims. In the interest of moving the case forward, however, Applicants have further amended Claims 1, 8, 11 and 19 to more clearly define the scope of the invention and address the Examiner's concerns. Applicants respectfully submit that the phrases "system model" and "presentation model" as used in each of the independent claims is now not only fully supported by the specification, they are also explicitly defined within the claims.

In light of the claims amendments and remarks above, Applicants respectfully request the Examiner to reconsider the claimed invention. Applicants reiterate that Li does not teach the various elements of the claimed invention. Each of the independent

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claims includes the elements of a system model and a presentation model. As described in the specification and now explicitly highlighted in the independent claims, a system model is "a collection of data and control concepts used in the software running on the computing device, such as a search profile" while a presentation model is "a way of envisioning the process of executing the search, which is how the computing device does the search, how the user conceptualizes the search, or some combination in between the two." (Specification, Page 5, paragraph 18). Li does not disclose these elements. Instead, Li discloses a system and method for a database *search facility* having an improved user interface. Li presents a query statement and a graphical representation of its result when searched in a database simultaneously in a graphical user interface (Li, Col. 1, lines 64-67). Li does not make any efforts to explain how the query is processed to arrive at the result. In contrast, according to embodiments of the present invention, instead of simply displaying a query and results in graphical form, as in Li, embodiments of the present invention generate a user interface that shows *how* a computer system does its search. It is readily apparent to those of ordinary skill in the art that seeing a graphical form of a "query" (the request) differs significantly than viewing a graphical representation of how the query is processed.

The Examiner continues to maintain that FIG. 3A of Li teaches the elements of a system model and a presentation model but Applicants strongly disagree. As described in Li, Col. 4, lines 59-67 through Col. 5, lines 1-24, the three windows illustrated in FIG. 3A are a query window (containing the most recent query statement), the graph window (showing the results of the query statement displayed in the query window in a graphical representation) and the history window (which records the activity of the user in both the query and the graph windows, to allow the user to quickly find previously created query statements, which greatly speeds up the process of data analysis). The Examiner asserts that these windows are comparable to the presentation model as claimed herein. Applicants strongly disagree. As previously discussed, the "presentation model" *explains* to a user how search input elements lead to the search results. More specifically, the presentation model in the independent claims herein conceptualizes how a system model relates a plurality of search input elements to a comparison element, wherein the

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comparison element is selected from a list of potential comparison elements. There is no such disclosure in Li, in FIG. 3A or otherwise.

The Examiner suggests that Li teaches the presentation model for the following reason: "the presentation shown in figure 3A is clearly a 'presentation model' that includes three windows... These three windows are used to explain... how a search structure (or system model) relates a plurality of search input elements) to a comparison element." Applicant fails to see how the result display in Li "explains" how the search input elements lead to the search results. Again, as described in Li, Query window 101 merely shows the query ("The query window 101 contains the most recent query statement in the current query" Li, Col. 4, lines 61-62) while Graph Window 102 shows a graphical representation of the results ("Graph window 102 shows the results of the query statement displayed in the query window in graphical representation." Li, Col. 4, lines 64-66). Similarly, the Tree window appears to show a "history" of the query ("The third window is a history window 103. In the preferred embodiment of the invention, the history of the query is presented as a graphic representation resembling a tree in which all of the query statements and their results are portrayed as nodes" Li, Col. 5, lines 3-7). These windows thus simply show the query and the results in a graphical format, with a simple scheme for the user to retrieve a previously constructed query. Nothing in these windows remotely resembles the "presentation model" claimed herein, as suggested by the Examiner.

The Examiner appears to confuse the detailed elements of the query itself as an "explanation" of the query. Applicants respectfully disagree. The query as shown in FIG. 3A of Li is a simple SQL query, well-known to those of ordinary skill in the database arts. Nothing in the query itself explains to the user how the query is processed. The Examiner's analysis of the elements in Li is therefore erroneous.

Furthermore, although the Examiner concedes that Li does not teach or suggest that a comparison element is selected from a list of potential comparison elements, the Examiner submits that Banning teaches this element and that it would have been obvious to combine Li with Banning. The Examiner thus submits that the combination of Li and Banning renders the claimed invention unpatentable. Again, Applicants respectfully traverse the Examiner's rejection.

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Without addressing the propriety of combining Li with Banning, Applicants respectfully reiterate that, as discussed in detail above, Li fails to teach or suggest various elements of independent Claims 1, 8, 11 and 19. The combination of Banning with Li is thus irrelevant because neither reference teaches or suggests a presentation model, system model and/or a comparison element, as claimed. Applicants therefore respectfully submit that neither Li nor Banning, alone or in combination, renders the Claims 1-9, 11-13, 16, 19, 21 and 22 unpatentable and respectfully request the Examiner to withdraw the rejection to these claims under 35 U.S.C. §103.

With respect to Claims 10 and Claims 14, 15, 17 and 18, Applicants respectfully submit that these claims are dependent on independent Claims 1, 8, 11 and 19. As a result, Applicants also traverse the rejection of these claims and submit that the above arguments are equally applicable to these claims. In other words, since Li (with or without Banning) does not teach or suggest various claimed elements, Li does not render the independent claims (and all claims dependent on these independent claims) unpatentable. Applicants therefore respectfully request the Examiner to withdraw the rejection to Claims 10, 14, 15, 17 and 18 under 35 U.S.C. §103.

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**CONCLUSION**

Based on the foregoing, Applicants respectfully submit that the applicable objections and rejections have been overcome and that pending Claims 1-19, 21 and 22 are in condition for allowance. Applicants therefore respectfully request an early issuance of a Notice of Allowance in this case. If the Examiner has any questions, the Examiner is invited to contact the undersigned at (714) 730-8225.

If there are any additional charges, please charge Deposit Account No. 50-0221.

Respectfully submitted,

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